

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

*This document relates to:*

*All Cases Noted on Attached Exhibit*

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND [PROPOSED] ORDER  
DISMISSING WITH PREJUDICE CLAIMS  
PURSUANT TO FLORIDA CVS SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, “Dismissing Plaintiffs”) and Defendants CVS Health Corporation, CVS Pharmacy, Inc., CVS Orlando FL Distribution, L.L.C., CVS Vero FL Distribution, L.L.C., CVS TN Distribution, L.L.C., CVS Rx Services, Inc., CVS Indiana, L.L.C., Holiday CVS, L.L.C., CVS Health Solutions, L.L.C., and Omnicare Distribution Center, L.L.C. (together, “CVS”<sup>1</sup>) that, pursuant to the election of each Dismissing Plaintiff to participate in the CVS Settlement Agreement attached hereto as Appendix B, all claims of each Dismissing Plaintiff against any CVS entity that is a defendant in the actions

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<sup>1</sup> The CVS Settlement Agreement is between the State of Florida, Office of Attorney General, on the one hand, and CVS Health Corporation and CVS Pharmacy, Inc., on the other, but the Settlement Agreement provides for participation by Dismissing Plaintiffs conditioned on their agreement, among other things, to release and dismiss their claims against all “Releasees,” which includes CVS Orlando FL Distribution, L.L.C., CVS Vero FL Distribution, L.L.C., CVS TN Distribution, L.L.C., CVS Rx Services, Inc., CVS Indiana, L.L.C., Holiday CVS, L.L.C., CVS Health Solutions, L.L.C., and Omnicare Distribution Center, L.L.C.. Settlement Agreement § A(bb) and A(cc) (attached as Appendix B). To the extent the parties discover that any Released Claim of any Dismissing Plaintiff remains pending against any Releasee following filing of this stipulation, the parties shall stipulate to the dismissal of those claims in a subsequent filing.

listed in Appendix A are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs.

Dated: May 25, 2022

Respectfully submitted,

Agreed as to form and substance:

**CVS**

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SO ORDERED this \_\_\_ day of May, 2022.

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Hon. Dan Aaron Polster  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

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